

REMARKS

In response to the Official Action mailed October 31, 2003, Applicants request reconsideration. In this Response, no claims are added, canceled, or amended, so that claims 1-12 remain pending. No new matter has been added.

The Official Action rejected claim 12 under 35 USC 112, alleging that there is no antecedent basis for "event handling editing means" in line 3 of the claim. This rejection is respectfully traversed. Applicants note that claim 12 depends from claim 1 via claims 10 and 2. Applicants further note that claim 1 explicitly recites an "event handling editing means." Clearly, antecedent basis exists. Thus, this rejection of claim 12 is erroneous and must be withdrawn.

Claims 1-11 were rejected as unpatentable over Fukazawa et al. (U.S. Patent 5,731,683, hereinafter Fukazawa) in view of Petler (U.S. Patent 5,542,034). That rejection is respectfully traversed.

Both Fukazawa and Petler are non-analogous art, and therefore cannot support the rejection. "In order to rely on a reference as a basis for rejection of an applicant's invention, the reference must either be in the field of applicant's endeavor or, if not, then be reasonably pertinent to the particular problem with which the inventor was concerned." *In re Oetiker*, 977 F.2d 1443, 1446, 24 USPQ2d 1443, 1445 (Fed. Cir. 1992). See MPEP 2141.01(a). Fukazawa relates to a system for designing large scale integrated circuits (see column 1, lines 10-14 of Fukazawa). Petler relates to generation of logic for a finite state machine (FSM) (see column 1, lines 7-10 of Petler). Clearly, neither reference relates to a user interface designing apparatus. Thus, Fukazawa and Petler are not in the field of applicants' endeavor.

Fukazawa and Petler are also not reasonably pertinent to the particular problem with which applicants were concerned. "A reference is reasonably pertinent if, even though it may be in a different field from that of the inventor's endeavor, it is one which, because of the matter with which it deals, logically would have commended itself to an inventor's attention in considering his problem." *In re Clay*, 966 F.2d 656, 659, 23 USPQ2d 1058, 1060-61 (Fed. Cir. 1992). Fukazawa and Petler disclose using a graphic user interface to design a circuit or a FSM, respectively (see Abstract of Fukazawa; column 2, lines 3-5 of Petler). However, neither reference even suggests an apparatus for designing those graphical user interfaces. For example, Fukazawa discloses that the state diagram preparation portion 1 is an editor for designing a state transition diagram 20 (see column 5, lines 46-56 of Fukazawa). But Fukazawa does not disclose an apparatus for designing that editor, i.e., an apparatus for designing the state diagram preparation portion 1. Likewise, Petler does not disclose an apparatus for designing the

graphical user interface that the user uses to input a FSM (see column 3, lines 23-31 of Petler). Accordingly, an inventor concerned with designing an apparatus with which to design graphical user interfaces would not turn his attention to references such as Fukazawa and Petler, which merely disclose the use of a graphical user interface and not the design of one.

Moreover, the combination of Fukazawa and Petler fails to teach or suggest all limitations of the claims. Regarding claim 1, the Official Action contends that Fukazawa teaches a state set editing means for adding/deleting states of a composite display part. However, Fukazawa clearly states that the state transition diagram preparation portion 1 is an editor for a state transition diagram 20 that shows transitional relationships of *operational states of a CPU*, not states of a composite display part (see column 5, lines 51-57 of Fukazawa). Likewise, the state transition table preparation portion 3 is an editor for preparing a state transition table 22 that designates transitional conditions for the CPU operational states of the state transition diagram 20 (see column 5, lines 62-68 of Fukazawa). CPU operational states are not display parts within the context of the invention. Accordingly, Fukazawa does not disclose a state set editing means or event handling editing means for editing states and state transitions of a composite display part of a graphical user interface.

The Official Action acknowledges that Fukazawa does not teach an elementary display part storing means, but further contends that this feature is taught by Petler. However, Petler discloses storage memory elements 12 for storing next values 15 corresponding to a next state (see column 3, lines 3-21 of Petler). For example, a next value of "110" corresponds to state ST1 (see Figure 3 of Petler). This next value 15 cannot be construed as an elementary display part that has been previously designed, as recited by claim 1. The next value 15 is neither a graphic to be displayed, nor designed previously. Thus, the storage elements 12 of Petler do not store elementary display parts designed previously, as alleged by the Official Action. The Official Action further contends that it would have been obvious to use the storage elements of Petler with the teachings of Fukazawa so that each state has a unique combination of registered outputs. However, even if that were true, it does not suggest the storage of elementary display parts that have been previously designed.

The Official Action does not appear to allege that either Fukazawa or Petler teaches or suggests the state display editing means of claim 1. Applicants note that since neither Fukazawa nor Petler discloses a composite display part or an elementary display part, the combination cannot teach the state display editing means of claim 1.

Because both Fukazawa and Petler are non-analogous art, and because the combination of Fukazawa and Petler fails to teach or suggest every limitation of claim 1, *prima facie*

obviousness has not been established. Accordingly, the rejection of claim 1 and its dependent claims should be withdrawn.

Regarding claims 3 and 4, Applicants further note that neither Fukazawa nor Petler discloses grouping states into a grouped state, or editing them *en bloc*. A CPU is not a display part within the scope of the patent application.

Regarding claim 5, Applicants further note that neither Fukazawa nor Petler makes any mention of storing display part properties corresponding to size, position, and external appearance. Storage memory elements 12 merely store values corresponding to a next state of a FSM.

Regarding claim 10, the Official Action does not detail how the combination of Fukazawa and Petler discloses a simulation means. Applicants note that even if Fukazawa did disclose a simulation means, it would simulate the designed circuit, not a display part. Furthermore, even if Petler did disclose a simulation means, it would simulate an FSM, not a display part.

Regarding claim 11, Applicants do not understand which feature of Fukazawa is alleged to be the virtual display part storing means. The text cited by the Official Action says nothing of virtual display parts, or a storing means for storing them (see column 12, line 55 to column 13, line 11 of Fukazawa).

Reconsideration and withdrawal of the rejections are earnestly solicited.

Respectfully submitted,



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